

1 Thomas

2 A. Dr. Carman Pal.

3 Q. Can you spell the last name?

4 A. P-A-L.

5 Q. The first doctor was Dr. Mark who?

6 A. Dr. Goorny.

7 Q. Can you spell that?

8 A. G-O-O-R-N-Y.

9 Q. Thank you.

10 A. I go until now to them.

11 Q. You still go to Dr. Goorny and

12 Dr. Pal now?

13 A. Yes.

14 Q. Is there Pal located the same place

15 as Dr. Goorny?

16 A. Same place. The eighth floor.

17 Q. Did you ever see either of those

18 doctors to talk about your right arm or hand?

19 A. Well, I go, you know, for an

20 examination and I told them what happened.

21 They said, do you have a doctor for your arm.

22 I said yes. Dr. Kyriakides.

23 Q. Very good. Thank you.

24 Dr. Goorny and Dr. Pal didn't treat

25 you for your arm?

1 Thomas

2 A. No. They are not for these things.

3 Q. Dr. Kyriakides did.

4 Before this day, did you ever hurt
5 your right shoulder, arm or hand?

6 A. No.

7 Q. Did a doctor ever treat you for any
8 problems regarding your right shoulder, arm or
9 hand?

10 A. Never. Never.

11 Q. Since this day, have you ever
12 re-injured your right shoulder, arm or hand?

13 A. No. I couldn't move it. I use my
14 left hand, which I never use my left hand.

15 Q. We will get to that.

16 MR. WHITTON: Move to strike the
17 non-responsive portions.

18 Q. Are you right-hand dominant?

19 A. Yes.

20 Q. When you were sent home from
21 St. Luke's, did they tell you anything that you
22 should do?

23 A. Yes. Don't move it. Do this and
24 that. I couldn't move it any way.

25 Q. You have to tell me what the this

1 Thomas

2 and that is.

3 A. Well, you know, in the emergency
4 room it's not like a private doctor. They
5 don't tell you everything.

6 Q. Other than telling you not to move
7 it, did they tell you anything else?

8 A. No. No.

9 Q. Did they tell you to take any type
10 of medications?

11 A. No medication.

12 Q. They tell you to use any ice?

13 A. How am I going to put the ice on
14 the cast?

15 Q. So they didn't tell you to do that?

16 A. No.

17 Q. You mentioned the name
18 Dr. Kyriakides.

19 A. Dr. Kyriakides.

20 Q. I'm going to refer that doctor as
21 Dr. K.

22 Is that okay with you?

23 MR. SEARS: It's hard for us to
24 pronounce it.

25 MR. WHITTON: Off the record.

1 Thomas

2 (Discussion held off the record.)

3 Q. After St. Luke's Hospital, where
4 was the next time you went for any type of
5 medical treatment regarding your right arm and
6 hand?

7 A. Dr. Kyriakides.

8 Q. Had you ever treated with that
9 physician before this incident?

10 A. No. I didn't know him.

11 Q. How did you come to learn of that
12 doctor?

13 A. From a lawyer.

14 Q. Would that be a lawyer in this
15 office?

16 A. No. No.

17 Q. Who was the person --

18 A. A Greek lawyer.

19 Q. A Greek lawyer. What was his name?

20 A. Latos and Latos.

21 Q. Was that person a family friend or
22 acquaintance?

23 A. No. I never knew him.

24 Q. When was the last time you saw
25 Dr. Kyriakides?

1 Thomas

2 A. Last week. I see him every month,
3 but I go every month for therapy. I have to go
4 at the -- at the end of this month to see
5 Dr. Kyriakides.

6 Q. So you're seeing him now,
7 approximately, once every month?

8 A. Right.

9 Q. For how long have you been seeing
10 Dr. Kyriakides, approximately, once every
11 month?

12 A. Almost a year and a half. I mean a
13 year and three months.

14 Q. Do you recall the first day that
15 you saw Dr. Kyriakides?

16 A. I don't really remember.

17 Q. When you first saw Dr. Kyriakides,
18 were you seeing him just once a month at that
19 time or more often or less often or something
20 else?

21 A. I think they give me paper and it's
22 written when I have to see the doctor and when
23 I have to go for therapy. It's every week.

24 Q. Is the therapy done in the same
25 office as Dr. Kyriakides?

1 Thomas

2 A. Yes. It's a big office.

3 Q. When you first went to see
4 Dr. Kyriakides, what did he do for you?

5 A. He sent me for MRI in Lenox
6 Hospital before he treat me. He has to see
7 everything before he.

8 Q. After you went for the MRI, did
9 Dr. Kyriakides speak to you about what the MRI
10 said?

11 A. Yes.

12 Q. What did he tell you?

13 A. Everything -- the nerves here.
14 They destroy my nerves of my hand (indicating).

15 Q. Talking about your right forearm
16 and hand?

17 A. Yes.

18 Q. Anything else that he told you?

19 A. Not really.

20 Q. Did he tell you what he could do
21 for you as a result of that?

22 A. Yes. He said if everything is
23 destroyed in your arm, the muscles and the
24 nerves and they did electrical tests. I was
25 jumping like that. First time.

1 Thomas

2 Q. Did he tell you the results?

3 A. I never had those things.

4 What?

5 Q. Did he tell the results of those
6 tests?

7 A. Yes. Everything is destroyed,
8 permanent damage.

9 Q. Did he tell you if there was any
10 treatment he could do for you?

11 A. Yes. He said maybe in the future I
12 do an operation.

13 Q. Did he tell you what type of
14 operation?

15 A. No.

16 Q. Did he explain what the operation
17 would do for you?

18 A. For the nerves.

19 Q. Did Dr. Kyriakides ever give you
20 any prescriptions for medication?

21 A. No. I took Ecotrin.

22 Q. I'm sorry?

23 A. Ecotrin for the pain.

24 Q. Over-the-counter?

25 A. Yes.

1 Thomas

2 Q. You buy that at a local store?

3 A. Yes. The big one.

4 Q. Dr. Kyriakides directed that you
5 have physical therapy, right?

6 A. Yes.

7 Q. Other than physical therapy and
8 sending you for the MRI and having you do the
9 electrical tests --

10 A. Right.

11 Q. -- did Dr. Kyriakides have you
12 undergo any other types of tests or treatment?

13 A. Well, when I go there every month
14 for him he check, you know.

15 Q. He examines your arm and your hand?

16 A. Yes.

17 Q. Other than examining it, does he do
18 anything else?

19 A. No. Therapy.

20 Q. The therapy, is that the same day
21 that you see Dr. Kyriakides?

22 A. No.

23 Q. Different day?

24 A. Different day.

25 Q. Presently, how often do you go for

1 Thomas

2 therapy?

3 A. Every week.

4 Q. How many times per week?

5 A. Once.

6 Q. One time per week every week?

7 A. Yes.

8 Q. You're still doing that?

9 A. Yes. Until now.

10 Q. When you go for the therapy, are
11 you seeing Dr. Kyriakides or are you seeing
12 someone else?

13 A. No. No other. Only Dr. Kyriakides
14 every month or maybe every two months.

15 Q. Does Dr. Kyriakides do your
16 physical therapy, as well?

17 A. No.

18 Q. Someone else, right?

19 A. No. He's a professional. He has
20 people to do it.

21 Q. Right.

22 Do you know the names of any of the
23 people who are doing the therapy?

24 A. Yes. Christina. She's Greek, too.
25 Some other guys.

1 Thomas

2 Q. When you go for the therapy, what
3 do they do for you?

4 A. Okay. They put my hand in -- four
5 times, my palm in a special water. They
6 have -- benadine (sic) or something like that
7 inside. Then they have a piece of paper. You
8 put it. They cover it and then they cover it
9 with towels, my hand and then they put -- for
10 fifteen minutes, electrical. They put the
11 wires like the doctor examine your heart and
12 stuff like that and then when they finish they
13 do massage.

14 Q. How long does this usually last?

15 A. Fifteen, twenty minutes.

16 Q. Other than that, is there anything
17 else at therapy that they do?

18 A. No. Only this.

19 Q. When they do that, does that do
20 anything for you?

21 A. No. They -- I sign that I was
22 there.

23 Q. Does it offer you any relief? Does
24 it help you with your arm?

25 A. Well, it helps a little bit, but it

1 Thomas

2 starts -- you know, the damage is there.

3 MR. WHITTON: Move to strike the
4 non-responsive portions.

5 Q. Let me ask you presently, what pain
6 or problems do you have with your right arm and
7 hand?

8 A. I'll tell you. For instance, I
9 cannot pick up a plate. It falls from my
10 hands. I cannot -- for instance, my blouse I'm
11 wearing it. I cannot take it out. The pain
12 comes from here (indicating).

13 Q. From your shoulder down to your
14 arm?

15 A. Yes. It kills me. A lot of pain.
16 I cannot clean anything in the house. I clean
17 with the left hand, but it's not the same.

18 Q. Besides you cleaning with your left
19 hand, do you have people that come in to clean
20 your house?

21 A. No.

22 Q. Did you do the cooking before this
23 accident?

24 A. Of course.

25 Q. Do you still do the cooking?

1 Thomas

2 A. With the left hand sometimes.

3 Q. With your left hand, right?

4 A. With the left land or we order
5 sometimes.

6 Q. The other household things like
7 laundry and stuff like that, do you take care
8 of that still?

9 A. The laundry, my neighbor, they were
10 helping me, but not anymore. My son goes down
11 with the clothes and stuff like that. The
12 laundry is downstairs in the lobby.

13 Q. Your son that lives with you?

14 A. Yes.

15 Q. Tony?

16 A. Yes. My son or my husband.

17 Q. So they help out with the laundry
18 now?

19 A. Yes.

20 Q. For all of the various medical
21 treatment and physical therapy, have you or
22 your husband had to pay any of that?

23 A. No. I have insurance.

24 Q. Other than the Ecotrin I think you
25 said you buy, other than that, have you had to

1 Thomas

2 buy anything else for any of your medical care?

3 A. For the pain?

4 Q. For anything related to your arm.

5 A. No. No.

6 Q. The cast that was on your arm, how
7 long did it stay on?

8 A. Two months by Dr. Kyriakides. He
9 took out the St. Luke's cast. He didn't like
10 it.

11 Q. He took it off after two months?

12 A. No. No. When I went to him --

13 Dr. Kyriakides he didn't like the cast that the
14 hospital did for me.

15 Q. He took that one off and put a
16 different one on?

17 A. Yes. Very good.

18 Q. It was also the same type of --

19 A. Yes. White.

20 Q. -- white, hard cast?

21 A. Yes.

22 Q. And that stayed on for two months?

23 A. Yes.

24 Q. Did Dr. Kyriakides explain to you
25 why you needed the cast on?

1 Thomas

2 A. Yes because maybe it was broken.
3 Something broken. Who knows? He knows
4 everything. He wrote, you know -- he writes
5 everything.

6 Q. I appreciate that part, but all I'm
7 asking is what you remember he said and if you
8 don't remember, you tell me.

9 A. Yes. They destroyed your hand
10 permanently.

11 Q. The cast, did you have to have a
12 sling, as well?

13 A. Yes.

14 Q. A cloth sling to hold it?

15 A. Yes.

16 Q. That was also on for two months?

17 A. No. Sometimes I take it out. It
18 gets dirty or something like that and I put it
19 back again.

20 Q. When the cast came off after two
21 months, did you have to wear anything else on
22 your arm?

23 A. No.

24 Q. As you sit here today --

25 A. Therapy only.

1 Thomas

2 Q. As you sit here today, are you
3 wearing anything on your arm or your hand?

4 A. No. No (indicating). Nothing.

5 Q. Other than what you have already
6 told me about the cooking and the cleaning and
7 holding things, are there any other things that
8 you used to do that you either can't do now or
9 have difficulty doing?

10 A. Yes.

11 Q. Other than what you told me?

12 A. Yes.

13 Q. What else?

14 A. Like for instance, I cannot go in
15 the shelves of the kitchen to get a cup or a
16 glass. I use this hand (indicating).

17 Q. You have to use your left hand
18 instead of your right hand?

19 A. They're going to fall down.

20 Q. You use your left hand?

21 A. Yes. No right hand. The left
22 hand.

23 MR. WHITTON: Off the record.

24 (Discussion held off the record.)

25 Q. Have you ever seen any pictures of

1 Thomas

2 the place where the accident happened?

3 A. No. No.

4 Q. Other than your attorneys, I don't
5 want to know what you said to your attorneys,
6 has anyone else ever spoken to you about what
7 happened, that they had knowledge about what
8 happened?

9 A. No. I don't say -- talk about it.

10 Q. Has Dr. Kyriakides told you how
11 long the therapy is going to last into the
12 future?

13 A. Not really, but I have the paper.
14 It's almost -- long time.

15 Q. Has he indicated to you another
16 month, another six months, another year, has he
17 told you how long?

18 A. I find out when I go at the end of
19 the month to see him.

20 MR. WHITTON: I will follow up in
21 writing to ask for a fresh
22 authorization.

23 Q. Other than what you already told
24 me, has Dr. Kyriakides explained anything else
25 to you about your shoulder, arm, hand problems?

1 Thomas

2 A. Yes. He told me it's permanent
3 damage.

4 Q. Anything else other than what you
5 told me?

6 A. No.

7 Q. Other than Dr. Kyriakides and the
8 therapist, St. Luke's Hospital, Elmhurst
9 Hospital and your family doctors, have you seen
10 or been treated at any other hospital, clinic
11 or physician?

12 A. Who, my family?

13 MR. SEARS: No. You.

14 Q. For your shoulder, arm and hand?

15 A. No. No. Only Dr. Kyriakides.

16 Q. So Dr. Kyriakides and we know about
17 the therapist with him, right?

18 A. That's it.

19 Q. And we know Elmhurst and St. Luke's
20 Hospitals, right?

21 A. Yes.

22 Q. And we know that you have discussed
23 with your family doctor a little bit?

24 A. A little bit, but they don't care.

25 Q. Other than those doctors and other